

HONORABLE JAMES L. ROBART  
HONORABLE THERESA L. FRICKE

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

HECTOR CODY ORTIZ, III  
Plaintiff,

vs.

PIERCE COUNTY, et al.  
Defendants.

No. 3:22-cv-05947-JLR-TLF

**STIPULATED MOTION TO AMEND  
CASE SCHEDULE**

The parties hereby stipulate and jointly move the Court to extend the current case schedule (Dkt # 60) as specified below, to afford the parties additional time for discovery. The parties agree that such an extension is necessary and supported by good cause.

The parties are continuing to work on written and document discovery, which efforts are and have been ongoing. The parties also anticipate depositions of a significant number of fact witnesses, starting with the Plaintiff being deposed on October 30. Plaintiff has also issued draft 30(b)(6) deposition notices to Defendants NaphCare, Inc. and Pierce County, and the parties will be conferring on the scope, designees, and timing of those depositions. Under the current case schedule, there is insufficient time for the parties to complete adequate fact discovery before the current December 2 expert disclosure deadline. Thus, it is necessary for the parties to have additional time.

Accordingly, the parties have conferred and agree that there is good cause pursuant to Fed. R. Civ. P. 16(b)(4) and LCR 16(b)(6) to adopt the following stipulated amended case schedule,

which allows further time to complete fact and expert discovery, and submit dispositive motions, as applicable.

Date	Item
April 18, 2025	Deadline for disclosure of expert testimony under FRCP 26(a)(2)
May 16, 2025	Deadline for disclosure of rebuttal expert testimony under FRCP 26(a)(2)
July 18, 2025	Deadline to Complete All Discovery
August 15, 2025	Deadline to File Motions Related to Discovery
September 19, 2025	Deadline to File Dispositive Motions
October 17, 2025	Deadline to Meet and Confer Regarding Scheduling of Settlement Conference or Mediation

The parties jointly and respectfully request that the Court adopt the parties' agreed amended case schedule, and enter the proposed Order attached hereto. This stipulated motion is without waiver of all parties' rights to seek any further extensions or relief of any kind.

STIPULATED AND RESPECTFULLY SUBMITTED ON this 24th day of October, 2024

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PIERCE COUNTY

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11 *Slothower, HAS, RN and NaphCare, Inc.*

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STIPULATED MOTION AND ORDER TO

AMEND CASE SCHEDULE

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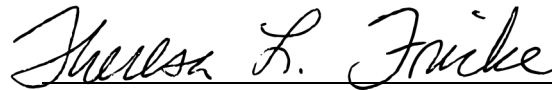
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**ORDER**

Based upon the foregoing Stipulation and for good cause shown, IT IS HEREBY ORDERED that the following case schedule is adopted from the date of this Order.

Date	Item
April 18, 2025	Deadline for disclosure of expert testimony under FRCP 26(a)(2)
May 16, 2025	Deadline for disclosure of rebuttal expert testimony under FRCP 26(a)(2)
July 18, 2025	Deadline to Complete All Discovery
August 15, 2025	Deadline to File Motions Related to Discovery
September 19, 2025	Deadline to File Dispositive Motions
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ORDERED this 28th day of October, 2024.



HONORABLE THERESA L. FRICKE  
United States Magistrate Judge